6/12/07 Workshop

Suction Dredge Mining Deadline: 6/22/07 Noon

From:

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To:

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Date:

Fri, Jun 8, 2007 4:32 PM

Subject:

"COMMENT LETTER - SUCTION DREDGE MINING"



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Looking for gold in California streams and rivers is a recreational activity for thousands of state residents. As WE remove sediments, sands, and gravel from streams and former mine sites to separate out the gold, *WE*ARE*ALSO REMOVING MERCURY. This mercury is the remnant of millions of pounds of pure mercury that was added to sluice boxes used by historic mining operations between 1850 and 1890. Modern day small-scale gold suction dredgers do not use mercury to recover gold during the operation of the dredge. Therefore, any gold that would be found in*OUR possession would be that which was extracted from the stream or river*WE*DREDGE IN.

Taking mercury out of streams benefits the environment. Efforts to collect mercury from recreational gold miners in the past, however, have been stymied due to perceived regulatory barriers. Disposal of mercury is normally subject to all regulations applicable to hazardous waste.

In 2000, EPA and California's Division of Toxic Substance Control worked in concert with other State and local agencies to find the regulatory flexibility needed to collect mercury in a simple and effective manner. In August and September, 2000 the first mercury "milk runs" collected 230 pounds of mercury. A Nevada County household waste collection event held in September 2000 collected about 10 pounds of mercury. The total amount of mercury collected was equivalent to the mercury load in 47 years worth of wastewater discharge from the city of Sacramento's sewage treatment plant or the mercury in a million mercury thermometers. This successful pilot program demonstrates how recreational gold miners and government agencies can work together to protect the environment (US EPA, 2001).

Mercury occurs in several different geochemical forms, including elemental mercury, ionic (or oxidized) mercury, and a suite of organic forms, the most important of which is methyl mercury. Methyl mercury is the form most readily incorporated into biological tissues and is most toxic to humans. The process of mercury removal by suction dredging does not contaminate the environment because small-scale suction dredging removes elemental mercury. Removal of elemental mercury before it can be converted, by bacteria, to methyl mercury is a very important component of environmental and human health protection provided as a secondary benefit of suction dredging ALSO WANT TO* MENTION THAT OUT OF ALL THE RIVERS I'VE DREDGED IN I FOUND LOTS OF LEAD DEPOSITED WITH THE GOLD AND MERCURY, *BECAUSE ITS WEIGHT IS CLOSE TO THE WEIGHT OF GOLD FOUND BUCKSHOT, BULLETS, FISHING WEIGHTS, ALL WITH THE GOLD DEPOSITS. MERCURY IS NOT ONLY UNSAFE TO FISH SPECIES BUT ALSO TO THE PEOPLE WHO CONSUME THOSE FISH *INCLUDING ME! IN*MY 30*YEARS OF DREDGING, WE STILL FIND LOTS OF MERCURY AND LEAD WITH THE GOLD.. IN ALL THE YEARS THAT I'VE BEEN DREDGING I HAVE NEVER SEEN ANY ILL EFFECTS ON THE RIVER OR ENVIRONMENT .IN FACT I'VE SEEN THE OPPOSITE , FISH GATHER AROUND ME AND WAIT FOR THE FOOD I STIR FROM THE BOTTOM OF THE RIVER.THEY LIKE WHAT'S GOING ON DOWN THERE.

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